U.S. Application No. 10/655,719

REMARKS

In the office action of February 8, 2006, claims 1-5, 7 and 8 were rejected under 35 USC 102(b) as being anticipated by Kisor et al. (EP 0683599A1). An earlier rejection under 35 USC 112, second paragraph, was withdrawn.

Withdrawal of the rejection under 35 USC 112, second paragraph, is appreciated.

The rejections under 35 USC 102(b) are respectfully traversed since Kisor et al. does not disclose each and every limitation of claims 1-5, 7 and 8.

Kisor et al. states at page 1:

> A dithered bilevel image file 68 is first compressed by analyzing blocks of pixels and counting the number of pixels that are turned on and represent a monochrome color (e.g., black). A compressed file 72 is created containing block pixel counts for all blocks in the dithered bilevel image file. Subsequently, the block pixel count file is decompressed 108 by using the block pixel counts for all of the blocks to randomly select predetermined block pixel patterns from a plurality of pixel pattern sets 110. Each pattern set includes a plurality of different block pixel patterns that present a range of different grey tone levels ranging from completely black to completely white. The pattern sets are used to create a transformed bit mapped image file 112 that can then be printed or displayed.

Kisor et al. thus generally teaches compression/de-compression of half-toned images, wherein decompression is performed "by using the block pixel counts for all of the blocks to randomly selected predetermined block pixel patterns from a plurality of pixel pattern sets 110."

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This is different from the claimed method of detecting a portion of a half-toned uniform area in a half-toned bit-map.

More particularly, Kisor et al. does not teach or suggest the claimed combinations, including for example:

> comparing each N-pixel tile to a corresponding N-pixel reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness;

> identifying an N-pixel tile as comprising a portion of a half-toned uniform region if it matches the corresponding N-pixel reference tile.

As to the contention in the office action that "Kisor et al. also discloses decompressing the compressed block pixel count data file by comparing 4x4 blocks of pixels with pattern sets which represent the 256 different ways in which the human eye can perceive the shades of gray (see columns 10-11, lines 43-34)," it is respectfully submitted that Kisor et al. does not teach any such "comparing." The portion of Kisor et al relied on by the office action includes the following:

> Step 108 uses pattern sets 110 to <u>assign</u> a predetermined pixel pattern <u>randomly selected</u> from a plurality of patterns, to each block where the selected pattern produces a predetermined grey tone level. (Col. 10/30 - 10/34) (Emphasis added)

> [T]he picture is created from the block pixel count data by <u>randomly selecting</u> a block pattern from a group of block patterns that all have the same grey scaling effect. (Col. 11/11 – 11/14) (Emphasis added)

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> Once a particular set has been randomly selected, the block pixel
> count number is used to <u>select</u> a particular pattern that has the
> same or nearly the same number of black pixels. (Col. 11/35 -
> 11/38) (Emphasis added)

As to the contention that "the Office interprets such patterns of Kisor et al. functionally equivalent to the reference tiles since such patterns represent all possible regular viewing of gray colors by the human eye," it is respectfully submitted that nothing in Kisor et al. teaches that such patterns correspond to the claimed "N-pixel reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness." Moreover, as discussed above, Kisor et al. does not teach comparing a tile to a reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness.

As to the contention in the office action that "Kisor et al. further discloses matching a pattern with a block of pixels using the block pixel count number and the same number of black pixels in the pattern (see column 11, lines 35-55)," it is respectfully submitted that, as discussed above, Kisor et al. teaches selecting a particular pattern that has the same or nearly the same number of black pixels by the block pixel count number. Further, Kisor et al. does not teach comparing a tile to a reference tile that comprises a half-toned binary pattern that would be produced by the predetermined half-toning procedure for such N-pixel tile if the portion of a pre-half-toned data that resulted in such N-pixel tile were of uniform lightness, and thus there could be no teaching of identifying an N-pixel tile as comprising a portion of a half-toned uniform region if it matches the corresponding N-pixel reference tile.

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Reconsideration is respectfully requested.

No additional fee is believed to be required for this response. However, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

If the Examiner considers telephone contact advantageous to the disposition of this case, please call Applicant's attorney, Manuel Quiogue at (585) 423-1235. The undersigned would be happy to discuss any Examiner-proposed amendments as may be appropriate.

Respectfully submitted,

Manuel Quiogue
Attorney for Applicants
Registration No. 26,978
Telephone (585) 423-1235

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